

6.1 Complete the following:

6.1.1 555 number applicants for initial and/or additional number assignments shall submit their requests to the appropriate Administrator(s) using the 555 Number Assignment Request and Confirmation Form. Separate request forms shall be submitted for initial and additional 555 numbers. The applicant will complete all required entries on the 555 NXX Request and Confirmation Form to the best of his/her knowledge.

6.1.2 Certify on the 555 NXX Request and Confirmation Form that to the best of his/her knowledge that necessary governmental/regulatory authorization has been obtained to provide the service(s) for which the 555 number is being requested.

6.2 The applicant shall agree to abide by the numbering conservation criteria and reclamation procedures described in Section 7 and 8.

6.3 The number assignment holder should provide, upon request of the access provider from which activation has been requested, confirmation of line number(s) and the NPA assignment(s).

6.4 The information associated with a 555 number assignment may change over time. Such changes may occur, for example, because of the transfer of a 555 number -- through merger or acquisition -- to a different company. These changes may include not only a change in company name, but also a change in the location to which calls made with a given 555 number are to be routed. Accordingly, the Administrator(s) must be informed using the 555 NXX Request and Confirmation Form, of these changes to ensure that an accurate record of the entity responsible for the 555 number and the data associated with the 555 number is maintained.

6.5 The holder of a 555 number acquired by merger, acquisition, or other means must use the number consistent with these guidelines.

6.6 A 555 number holder must participate in any audits conducted by the Administrator. Items that may be audited:

1. Proof of certification or license to operate in the assigned area, if applicable.
2. Proof that the number is accessible through the PSTN.
3. Proof that the number is being used in accordance with the guidelines.
4. Verification of NPAs where the number is activated and the date of activation.

5. Validation of Company name and address.

- 6.7 A 555 number assigned to an entity, either directly by the Administrator or through merger or acquisition, should be placed in service within 12 months after assignment. Certification of in-service status will be required (see 555 NXX Request and Confirmation Form). If the assignee no longer has need for the 555 number, the number should be voluntarily returned to the Administrator(s) for reassignment. See Section 7.
- 6.8 In-service certification (See Part 3 of the 555 NXX Request and Confirmation Form) should be provided by the entity either immediately upon the achievement of activation levels as identified in Section 4.8 for number retention entitlement, or within eighteen (18) months after assignment.

7.0 Reclamation Procedures

7.1 Assignee Responsibility

The entity to which a 555 number(s) has been assigned shall return the 555 number(s) to its administrator if:

- It is no longer needed by the entity for the purpose for which it was originally assigned
- The service it was assigned for is discontinued, or
- The 555 number(s) was not activated within the activation timeframe specified in these guidelines.

In the latter case, the assignee may apply to the administrator for an extension date. Such an extension request must include the reason for the delay and a new activation time commitment.

7.2 Administrator Responsibility

- The 555 number administrator will contact any 555 number assignee(s) identified as not having returned to the administrator for reassignment of any 555 number:
 - Assigned, but no longer in use by the assignee(s),
 - Assigned to a service no longer offered,
 - Assigned, but not activated within the activation timeframe specified in these guidelines, or
 - Assigned but not used in conformance with these assignment guidelines.

The administrator will seek clarification from the assignee(s) regarding the alleged non-use or misuse. If the assignee(s) provides an explanation satisfactory to the administrator, and in conformance with these assignment guidelines the 555 number(s) will remain assigned. If no satisfactory explanation is provided, the administrator will request a letter

from the assignee(s) returning the assigned 555 number(s). If a direct contact can not be made with the assignee(s) to effect the above process a registered letter will be sent to the assignee(s) address of record requesting that they contact the administrator within 30 days regarding the alleged 555 number(s) non-use or misuse. If the letter is returned as non-delivered the administrator will advise the INC that the 555 number(s) will be made available for reassignment following the established idle period, if any unless the INC advises otherwise within 30 days.

- The 555 number administrator will refer to the INC for resolution any instance where a NANP-assigned 555 number has not been returned for reassignment by the assignee if:
 - The resource has not been activated within the activation timeframe specified in these guidelines.
 - A previously activated 555 number(s) is not now in use.
 - An activated 555 number(s) is not being used in accordance with these assignment guidelines.
- If a 555 number is not activated within the activation timeframe specified in these guidelines and the administrator determines, by discussion with the 555 number assignee(s), that the reason for the non-activation is not within the control of the assignee(s), the administrator may extend the activation date by up to 90 days.
- The 555 number administrator will receive, process and refer to the INC for resolution any application from 555 number assignees for an extension on the activation timeframe specified in these guidelines when the:
 - Activation has not occurred within the 90 day extension,
 - Administrator believes that the activation has not occurred due to reason within the assignee's control, or
 - Assignee requests an extension in excess of 90 days.

Referral to INC will include the offered reason why the extension is requested, a new proposed activation date, and the administrator's recommended action.

The 555 number administrator will make all returned resources available for assignment following the established idle time, if any.

7.3 INC Responsibilities

The INC will:

- Accept all referrals of alleged non-use or misuse of 555 number(s) from the 555 number administrator or any other entity, by referring issues to the Resource Management Workshop
- Investigate the referral,

- Review referrals in the context of these assignment guidelines,
- Attempt to resolve the referral, and
- Direct the 555 number administrator regarding the action, if any, to be taken.

Absent a consensus resolution of the referral or non compliance to the resolution by the 555 number assignee, the case will be referred by INC via the CLC process, to the appropriate regulatory body for resolution.

8.0 555 Number Conservation

Assignment of World Zone 1 numbering resources is undertaken with the following objectives: to efficiently and effectively administer/manage a limited NANP resource through sound conservation practices. In meeting these objectives the following are conservation measures to be taken by the Administrator(s).

- 8.1 Review the annual Report of 555 Line Number Active Status as shown in Appendix B. The results of these reviews will be used to determine if the 555 numbers are being used in accordance with these guidelines and could be used to advise applicants in which NPAs 555 numbers are available. This information will be available from the Administrator(s) upon request.
- 8.2 When 555 number resource assignments has reached 70% of the total 555 resource of assignable numbers, the following actions will be taken.
 - (a) The Administrator(s) will notify the industry that the 555 number resource has reached the 70% level and based on the current assignment rate will provide a projection when the numbers will exhaust. Special conservation measures will be invoked immediately (if appropriate).
 - (b) Special conservation measure limiting new 555 line number request assignments to one line number per entity per application.
 - (c) Form an industry workshop to consider alternatives, etc.

9.0 Maintenance of These Guidelines

It may be necessary to modify these assignment guidelines periodically to meet changing circumstances. The Industry Numbering Committee (INC) is currently the group responsible for reviewing and concurring on any modifications to these guidelines.

10.0 Appeals Process

10.1 Disagreements may arise between the Administrator(s) and 555 number holders/applicants in the context of the administration of these guidelines. In all cases, the Administrator(s) and 555 number holders/applicants will make reasonable, good faith efforts to resolve such disagreements among themselves consistent with the guidelines prior to pursuing any appeal. Appeals may include but are not limited to one or more of the following options:

- The 555 number holder/applicant will have the opportunity to resubmit the matter to the Administrator(s) for reconsideration with or without additional input.
- Guidelines interpretation/clarification questions may be referred to the body responsible for maintenance of the guidelines. These questions will be submitted in a generic manner protecting the identity of the appellant.
- The Administrator(s) and 555 number holders/applicant may pursue the disagreement with the appropriate governmental/regulatory body.

10.2 Requests for modification of the guidelines can be pursued as described in Section 8 of the guidelines.

10.3 Reports on any resolution resulting from the above options, the content of which will be mutually agreed upon by the involved parties, will be forwarded to the body responsible for the maintenance of the guidelines. At minimum the report will contain the final disposition of the appeal, e.g., whether or not a 555 number was assigned.

11. Glossary

Administrator

The organization responsible for assignment and overall administration of the 555 line number resource in accordance with these guidelines. The Administrator is North American Numbering Plan administration.

Certify	<p>(When used by the applicant): As part of the 555 Number Assignment request, to confirm, through a formal statement signed by the applicant or an authorized representative, that the information contained within the assignment request is true, accurate, and complete to the best of his/her knowledge.</p> <p>(When used by the regulator): Where applicable, to authorize, in writing, an entity to provide a telecommunications service in the relevant geographic area. Such authorization is the responsibility of the appropriate regulatory agency.</p>
555 Number Holder	The entity to whom a 555 number has been assigned.
CPCN	Certificate of Public Convenience and Necessity - A regulatory certificate allowing an entity the ability to conduct business in a specific jurisdiction.
Confidential Information	Information given by any means or methods to the 555 line number Administrator in the course of administering the guidelines, that in the opinion of the line number requester, should only be revealed to parties who have a need to know in order to carry out the administration of the guidelines.
Conservation	Consideration given to the efficient and effective use of a finite numbering resource in order to minimize the cost and need to expand its availability, while at the same time allowing the maximum flexibility in the introduction of new services, capabilities and features.
Entity	For the purposes of obtaining a 555 number, an entity is an applicant that meets the criteria of the guidelines and, as a business, purchases telecommunication interconnection arrangements.
Fictitious Numbers	A 555 line number in the range between and including 555-0100 to 555-0199. These numbers will not be assigned to be placed in service. They, therefore, may be used by the entertainment/advertising industries in advertisements, publications, radio, television, movies, etc. Calls to these numbers placed accidentally or by curiosity seekers will not complete.

INC	The Industry Numbering Committee is structured as a standing committee under the Industry Carriers Compatibility Forum (ICCF). The mission of the INC is to provide an open forum to address and resolve industry-wide issues associated with the planning, administration, allocation, assignment and use of numbering resources and related dialing considerations for public telecommunications.
Information Services	Information services means the offering of capability for generating, acquiring, storing, transforming, processing, retrieving, utilizing, or making available information via telecommunications.
In-service	An active 555 line number in which a specific subscriber, service or market trial is utilizing the assigned number.
Geographic NPA	A Numbering Plan Area (NPA), also called an area code, is the 3-digit code that occupies the A, B, and C positions in the 10-digit NANP format that applies throughout World Zone 1. NPAs are of the form N0/1X, where N represents the digits 2-9 and X represents any digit 0-9. After 1/1/95, NPAs will be of the form NXX. In the NANP, NPAs are classified as either geographic or non-geographic. Geographic NPAs correspond to discrete geographic areas within World Zone 1.
NANP	The North American Numbering Plan is a numbering architecture in which every station in World Zone 1 is identified by a unique ten-digit address consisting of a three-digit NPA code, a three digit central office code of the form NNX/NXX, and a four-digit line number of the form XXXX.
National number	A national number is a unique line number in the 555 NXX assigned to an entity for use in all or most of the geographic NPAs in World Zone 1. A number will be designated as a national number if it is to be used in at least 30% of all NPAs or states or provinces in World Zone 1. National numbers cannot be assigned by the Administrator to any other entity.

Non-national number	A non-national number is a line number in the 555 NXX assigned to an entity for use in a specific geographic area or areas (NPAs, states, or provinces). A number will be designated non-national if it is to be used in fewer than 30% of NPAs or states or provinces. Non-national numbers are available for assignment to multiple entities, assuming those entities wish to use the non-national number in different geographic NPAs.
Private Networks	Private networks are composed of stations which are not directly accessible from all PSTN stations via the use of NANP E.164 numbers.
PSTN	Public Switched Telephone Network. The PSTN is composed of all transmission and switching facilities and signal processors supplied and operated by all telecommunications common carriers for use by the public. Every station on the PSTN is capable of being accessed from every other station on the PSTN via the use of NANP E.164 numbers.
Reclassification	A process in which a national number is changed to a non-national number. At the time of reclassification, an entity may be permitted to retain the use of the 555 line numbers in specific NPAs, provided the requirements of these guidelines are met.
Service Providers	Any entity that is authorized, as appropriate, by local, state, federal or World Zone 1 governmental authorities to provide communications services to the public.
World Zone 1	Consists of United States, Canada and the Caribbean administrations currently within NPA code 809.

APPENDIX A

555 NXX Assignment Request and Confirmation Forms

Cover Sheet

- Part 1:** Request for 555 number Assignment
- Part 2:** Administrator's Response/Confirmation Form
- Part 3:** In-Service Certification Form

555 NXX Assignment Request Form- Part 1

Please complete the following form to request line numbers in the 555 NXX resource. Mail or fax the completed form to the Administrator. A separate form should be used for requesting initial or additional 555 numbers. A maximum of five (5) 555 numbers may be requested per form.

The Applicant and the 555 number Administrator acknowledge that the information contained on this request form is sensitive and will be treated as confidential.

1. Name of entity requesting 555 Number(s): _____

2. Contact information:

Applicant

Name: _____

Address: _____

City, State, ZIP: _____

Phone: _____

FAX: _____

Company Name¹: _____

3. Type of Request (Select One):

- _____ Initial 555 number assignment² (Go to Section 3a)
- _____ Additional 555 number assignment (Go to Section 3b)
- _____ Update or change information (Go to Section 6)
- _____ 555 Number Return Notification (Go to Section 7)
- _____ Additional NPAs for existing non-national number (Go to Section 3c)

Note: It is the responsibility of the applicant to arrange for 555 line number activation, deactivation, and changes.

¹ If the Company Name differs from the entity requesting the number(s), a letter must be attached from the entity indicating that this agent is authorized to act on their behalf.

² The first five 555 line number assignments are classified as "initial" assignments. Entities may use single or multiple forms to apply for any or all of these first five 555 numbers. Requests for 555 number assignments beyond the first five 555 initial numbers are classified as "additional" assignments and should be requested on a separate form.

555 NXX Assignment Request Form- Part 1

3a. Initial 555 Number Assignment(s)

Quantity of initial 555 number(s) being requested on this form: _____

Have other initial 555 number(s) been assigned to this entity? _____ Yes _____ No

If yes, please complete Part (a) of the attached worksheet (Attachment A).

Proceed to Section 4.

3b. Additional 555 Number Assignment(s)

Quantity of additional 555 number(s) being requested on this form³: _____

Please list all 555 numbers assigned to this entity by completing Part (a) and/or Part (b) of the attached worksheet (Attachment A).

Proceed to Section 4.

3c. Additional NPAs for Existing Non-National Number

Enter the non-national number for which additional NPAs are being requested: 555- _____

For this request, list additional NPAs for which the above non-national number shall be assigned:

Planned in service date(s) for the above additional NPAs requested on this form (list separate dates for multiple NPAs, if the dates are different): _____

Proceed to Section 5.

4. National or Non-National Number Classification

For each 555 request on this form please indicate if the number will be used on a national⁴ or non-national⁵ basis and provide appropriate certification that the numbers will meet the criteria for a national or non-national number per Section 4.0 of the guidelines.

4a. Total national number(s) on this request form: _____

³ Requests for additional 555 numbers may be for up to a maximum of five national and/or non-national numbers per form. All previous 555 number assignments must meet the criteria specified in Section 4.4 of the guidelines before additional 555 numbers will be assigned by the Administrator.

⁴ A national number is a unique line number in the 555 NXX assigned to an entity for use in all or most of the geographic NPAs in World Zone 1. A number will be designated as a national number if it is to be used in at least 30% of all NPAs or states or provinces in World Zone 1. National numbers cannot be assigned by the Administrator to any other entity. A national number must be in service in at least 30% of World Zone 1 NPAs or states or provinces within an 18-month period (See Section 4 of the guidelines).

⁵ A non-national number is a line number in the 555 NXX assigned to an entity for use in a specific geographic area or areas (NPAs, states, or provinces). A number will be designated non-national if it is to be used in fewer than 30% of NPAs or states or provinces. Non-national numbers are available for assignment to multiple entities, assuming those entities wish to use the non-national number in different geographic NPAs.

555 NXX Assignment Request Form- Part 1

For this request, specify national 555 number assignment preference(s) in order of priority (optional):

Planned in service date(s) for the above 555 numbers requested on this form⁶ (List separate dates for multiple number requests, if the dates are different):

Will all requested national numbers on this form be activated in at least 30% of World Zone 1 NPAs or states or provinces within an 18-month period? ____ Yes ____ No

If no, explain circumstances of those that will not meet this criteria:

Have all the previously assigned 555 national numbers listed on Attachment A been activated in at least 10% of the World Zone 1 geographic NPAs or states or provinces? ____ Yes ____ No

If no, explain:

4b. Total non-national number(s) on this request form: ____

For this request, specify non-national 555 number assignment preference(s) in order of priority (optional):

Planned in service date(s) for the above 555 numbers requested on this form⁶ (List separate dates for multiple number requests, if the dates are different):

Have all the previously assigned 555 non-national numbers listed on Attachment A been activated in the NPA in which they were requested, or in at least 10% of the World Zone 1 geographic NPAs in which they were requested? ____ Yes ____ No

If no, explain:

⁶ Each assigned 555 number must be in service or activated within 12 months from the date of assignment.

555 NXX Assignment Request Form- Part 1

4c. List NPAs in which non-national numbers requested on this form will be activated (use separate sheet if necessary):

5. Service Description(s)

a) Please provide a description of the type of service for each 555 number being requested:

555 Number or Classification*	Description
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____

* National or Non-national

b) • Is regulatory certification or authorization required to provide this type of service(s) in the relevant geographic area?

Yes _____ No _____

• If yes, does the requesting entity have such certification or authorization (See Section 4.1.3)?

Yes _____ No _____

If yes, type and date of certification or authorization (e.g. letter of authorization, license, CPCN, tariff, etc.):

If no or pending, explain:

6. 555 Number Updates or Changes

555 NXX Assignment Request Form- Part 1

Please indicate the updates or changes to current 555 number assignment information:

555 Number(s) _____

Update or Change Information:

7. 555 Number Return Notification

Please return the following 555 number(s) to the list of available numbers:

Reason for return:

**555 Number(s)
Assigned**

NPAs Assigned⁷

1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

Effective Date: _____

⁷ For national number assignments the Administrator should enter "National" in the NPAs Assigned field.

555 NXX Assignment Request Form- Part 1

It is understood that the applicant* will return the assigned 555 number(s) to the administrator for reassignment if the 555 number(s) is no longer in use by the applicant, no longer required for the service for which it was intended, not activated within the activation timeframe specified in these guidelines (an extension can be applied for), or not used in conformance with these assignment guidelines.

I hereby certify that the above information requesting a 555 number assignment(s) is true and accurate to the best of my knowledge, that the assigned 555 number(s) will be used in the provisioning of a public telecommunications service(s), and that this application has been prepared in accordance with the "555 NXX Assignment Guidelines" in effect on April 1995.⁸

Signature of 555 Number Applicant or Authorized Representative

Name/Title

Date

Date of Receipt of Application (to be completed by the Administrator(s))⁹ : _____

* either an individual applicant or the several users of a shared use resource

⁸ A copy of the "555 NXX Assignment Guidelines" can be obtained from the Administrator(s).

⁹ Acknowledgment and indication of disposition of this application will be provided to applicant within ten working days from the date of receipt of this application using Part 2 of this application form. Note: An incomplete form may result in delays in processing this request.

555 NXX Assignment Request Form- Part 1

ATTACHMENT A

Current 555 Number Assignments

Date: _____

Entity Name: _____

a. Initial 555 Number Assignments

555 Number Classification*

1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

b. Additional 555 Number Assignments

555 Number Classification*

1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____
6.	_____	_____
7.	_____	_____
8.	_____	_____
9.	_____	_____
10.	_____	_____

* National or Non-National

APPENDIX B

ANNUAL REPORT OF 555 LINE NUMBER ACTIVATION STATUS

To assist in the administration of 555 line numbers, i.e., NPA-555-XXXX, access providers and number holders are requested to provide 555 line activation reports annually to the Administrator. The 555 line number reporting information described below has been developed for use by the access providers and number holders in preparing the annual reports.

Report Format

The following minimum activation information should be provided to the Administrator when submitting the annual activation reports:

- a. The 10-digit 555 line number, e.g., 201-555-2222, that is in active use,
- b. The entity name which holds the above line number, and
- c. The access provider for the above line number.

Report Format on Diskette

As 555 line number assignments increase, it might be easier to report and analyze line activation information if provided in machine readable format on diskette (either 3 1/2" or 5 1/4" format). If the access provider or service provider chooses to submit their annual reports in this manner, to assure consistency, the format for the data to be presented on diskette should be as follows.

- a. The format for each record shall consist of one ASCII text line with each field separated by a comma "," delimiter. The delimiter shall not be considered part of any field.
- b. The maximum line length (including comma delimiters) for each record is 67 characters.
- c. All fields must be represented in each record. That is, if information for a field is not available or is blank, e.g., the access provider name is not known, a delimiter shall immediately follow the previous delimiter, i.e., ",".
- d. To avoid confusion with the comma delimiter, no commas shall be part of the data in any field, particularly in the entity name field where it is common to follow the entity name with ", Inc".

Each record shall consist of the 3 fields listed below. Maximum lengths are specified for each field. A record shall consist of a sequence of fields following the exact order shown below, i.e., line, ename and apn.

FIELD NAME	DESCRIPTION	TYPE	LENGTH
line	555 line number (NPA-555-XXXX)	Text	10
ename	Entity name	Text	40
apn	Abbreviated Access Provider Name (e.g., SWBT)	Text	15

A sample line in the report on diskette would appear as follows:
2015552222,ABC Inc.,Local Telephone Co.

Submitting Reports

Access providers and number holders shall submit their annual 555 line number reports to the Administrator, either in hard copy or on diskette, no later than January 31 of each year.

555 NXX Assignment Request- Part 2

Administrator's Response/Confirmation Form

Date of Application: _____

Date of Receipt: _____

Date of Response: _____

Entity Name: _____

Administrator Contact Information:

Signature of Administrator _____

Phone: _____

Name (print) _____

Fax: _____

_____ **555 Number(s)
Assigned**

NPA's Assigned¹

1. _____
2. _____
3. _____
4. _____
5. _____

Date of Number Assignment(s): _____

_____ **Request Form incomplete**

Additional information required in the following section(s):

_____ **Form complete, 555 Number request denied.**

Explanation: _____

_____ **Assignment activity suspended by the Administrator.**

Explanation: _____

Further Action: _____

Remarks: _____

¹ For national number assignments the Administrator should enter "National" in the NPA's Assigned field.

In-Service Certification Form

By signing below, I certify that the 555 Line Numbers specified below are in service in the NPAs indicated and that the 555 Numbers are being used for the purpose specified in the original application.

Entity Name

Authorized Representative of Applicant (Print)

Signature _____

Title _____

Date _____

555 Number	NPA/States/ Provinces	Date of Application	In-Service Date
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[illegible]

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**OPTIONS FOR ADDRESSING 800/888 EXHAUST
JUNE 6, 1995**

- 1. RATIONING NUMBERS:** Limit the weekly consumption of 800 numbers to a given number per RESPORG to insure that numbers are available until 888 is implemented.
- 2. PROHIBIT RESPORG CLONING:** Freeze the number of RESPORGs until 888 is implemented, thereby preventing existing RESPORGs from creating false RESPORG status as a ploy to gain additional rations of numbers.
- 3. ADOPT THE "NO CUSTOMER/NO NUMBER" RULE:** Establish a formal Commission rule that no number can be taken from the data base unless a specific customer negotiation is underway for that number. Further require that all RESPORGs immediately return any and all 800 numbers under their control that do not have a specific customer (i.e., the number is associated with a specific customer request for service).
- 4. PROHIBIT NUMBER SURFING:** Prohibit high speed computer generated transactions that take large volumes of numbers from the data base, based on some appealing characteristic of the number (easily remembered or vanity). Transactions must have a corresponding customer request (as identified in Proposed Option #3).
- 5. OPEN 888 IN PHASES:** Slowly activate 888 when it is available, activating only three month's worth of NXXs within 888 at a time. This will manage the process and protect the SMS/800 computer system from overload on day one of 888.
- 6. OVERRIDE 800 SUBSCRIBERS' CLAIMS TO MATCHING 888 NUMBERS:** Establish that no 800 subscriber owns the right to first refusal of the matching 888 numbers.
- 7. IMPROVE 888 IMPLEMENTATION DATE:** The 888 implementation date is based on commitment dates from switch vendors and software developers and the associated installation and testing. These elements are not under LEC control.
- 8. 888 NXX PLAN:** The proposed 888 NXX plan is not in the public interest and would not result in a sufficient time savings benefit that would offset the cost and subsequent delay of portability. The time savings would be dependent upon resolution of many non-network related issues before NXX activation could begin. The NXX plan would also be discriminatory against small carriers that use vertical features and POTS translations and LECs that use the data base to offer intraLATA services.

OPTIONS FOR ADDRESSING 800/888 EXHAUST JUNE 6, 1995

By current estimates, which are probably understated because of the enormous run on 800 numbers during the past several months, the nationwide supply of 800 numbers will exhaust not later than August of 1995. If demand increases, exhaust will occur sooner. This does not necessarily mean that customers will no longer be able to obtain 800 numbers, for, as is described below, there is some indication that certain service providers may be reserving numbers without corresponding customer requests, contrary to the Guidelines for 800 Data Base Number Administration.

The national data base of 800 numbers was only recently projected to exhaust no later than October 1995. The 888 INPA will be implemented nationally in April 1996, and cannot be implemented earlier with portable numbers. There will thus be at least a six month's period during which there will be limited 800 and no 888 numbers available in SMS/800 for assignment.

The Bell Operating Companies (BOCs) began alerting the North American Numbering Plan Administrator (NANPA) and the industry of potential number exhaust in August 1994. Since then, the drain on 800 numbers has increased dramatically. Earlier this year, 40-45,000 numbers per week were being consumed. The last four weeks have averaged over 70,000. Approximately 92,000 numbers were taken the week ending May 29. If this pace is maintained, exhaust will occur in August, not October.

Several of the BOCs have proposed various number conservation/reclamation measures to delay exhaust, which other segments of the industry have declined to accept. The BOCs lack authority to impose a solution upon the industry, and therefore have developed the following list of options that could be considered by the FCC to address the problems of 800 and 888 number exhaust.

1. RATIONING NUMBERS: To avoid 800 number exhaust, the quantity of 800 numbers available to RESPORGs (Responsible Organizations) must be rationed. The easiest method of rationing is simply to divide the total amount of remaining 800 numbers by the weeks remaining until April 1996 by the number of RESPORGs. That would result in a ration of 133 numbers per RESP ORG per week, based on the following:

Available 800 numbers as of 5/30/95 = 816,059
Weeks to portability = 44
Weekly allocation average = 18,540
Number of RESP ORGs = 139

2. PROHIBIT RESPORG CLONING: RESPORGs must be prohibited from cloning themselves to secure additional numbers. Currently, any individual or business entity can declare itself a RESPORG. Absent a freeze on the RESPORG base, existing RESPORGs may simply create new RESPORGs and claim additional numbers.

Rationing 800 numbers and freezing the creation of RESPORGs until April 1996 will be strongly opposed by many service providers who will claim that a mandatory rationing scheme will impede their ability to do business. Many subscribers of 800 service will also object to rationing on the grounds that there will be no fair way to decide who gets numbers, and who does not, if requests in a given week exceed the numbers available.

3. ADOPT THE "NO CUSTOMER/NO NUMBER" RULE AND RECLAIM NUMBERS:

No 800 number must be allowed to be taken from the data base unless a specific customer is involved in negotiations for or has requested the number. This rule is included in the national guidelines for 800 number assignment developed through the industry forum process. The guidelines are voluntary, however.

The "no customer/no number" guidelines must be adopted as a Commission rule, with significant penalties for violation. The rule must apply to both interim and long term solutions. All service providers must be ordered to immediately return to the data base all numbers for which no true customer exists. Service providers must not be allowed to retain reserves of numbers for future use.

4. PROHIBIT NUMBER SURFING: Computer programs that flood the national data base with huge volumes of high speed transactions must be regulated. Such programs mechanically search the data base for all available numbers that meet certain criteria, then immediately reserve the numbers for future use. Computer generated transactions do not violate existing guidelines if the number of transactions matches the number of actual customer requests. The problem arises when the computer programs simply search the data base at the speed of light to reserve as many easily remembered or vanity numbers as possible. This tactic must be explicitly prohibited.

5. OPEN 888 IN PHASES: The new 888 code should be opened for assignment in phases. No more than a three month's supply (approximately 600,000 numbers) should be opened at a time. To ensure the integrity and performance of the SMS/800, the three month's supply of NXXs should be opened on a staggered basis, maybe five to ten NXXs per day, to spread the system access across the first several days of the three month period. The Commission can track the rate of consumption of the 888 numbers that were opened. If what was projected to be a three month's supply is consumed in a much shorter period, the Commission could then examine the cause of this consumption rate to determine if more stringent conservation methods are appropriate.

6. OVERRIDE 800 SUBSCRIBERS' CLAIMS TO MATCHING 888 NUMBERS: Certain 800 service subscribers may claim a right to matching 888 numbers. For example, the subscriber using 1-800-FLOWERS may claim the matching 1-888-FLOWERS. The Commission must rule that no rights to the matching 888 numbers exist for any 800 subscriber. In addition, the Commission should determine the necessity of modifying relevant assignment guidelines to preclude such duplication of 800 and 888 numbers.

7. IMPROVE 888 IMPLEMENTATION DATE: The National LEC 800 Product Team published the LEC "888 Portability" Network Implementation Plan on March 31, 1995 (a copy

was provided to the Policy Division). The 888 plan indicated that LEC networks would be in a position to process 888 calls by April 1996. The plan also identified the steps involved in the implementation process. Included in those steps are the following critical tasks upon which the April 1996 date is based:

- a. Changes must be made to the Service Switching Point (SSP) functionality that resides in LEC end offices and access tandems to allow data base queries to the new 888 code. Currently, the SSP software, as provided by the largest manufacturers of the LEC end offices and tandems, is only capable of launching queries for 800. The manufacturers have indicated that SSP modifications will not be fully available for all office types until fourth quarter 1995, with some office types as late as December 31, 1995. LECs must then install and test the manufacturers' changes in switches across the country. This installation and testing is expected to require a minimum of 60 days. At that time, tests between the LEC networks and interexchange carrier networks will be conducted. These inter-network tests are defined by the Network Operations Forum (NOF - a national forum of local and interexchange carrier network experts) and will take 30 days to complete.
- b. Software changes to the SMS/800 are scheduled to be completed by December 30, 1995. This represents the best available date from the SMS/800 software developers and will entail the postponement of several other important projects.
- c. Software changes to the data bases that reside in LEC networks (the Service Control Points - SCPs) that contain the routing information downloaded from the national SMS/800 data base must be deployed to SCPs throughout the country and tested to insure inter-operability with the new SMS/800 code. The software modifications are scheduled to be completed by January 1, 1996. This date assumes postponement of several other SCP related projects. Installation of the SCP software in all LEC networks is scheduled to be completed by February 28, 1996.

There is no slack in the April 1996 date. The vendors (switch manufacturers and data base software developers) have indicated that December 1995 delivery is best case; the LECs have no expectations that the dates will be improved. Once the switch vendors have delivered the SSP modifications, the LECs must conduct appropriate testing to ensure that 888 calls will be handled properly, and that existing 800 traffic will not be impaired. These changes are being made to the same network elements that handle 800 traffic; therefore, significant care must be taken to ensure no injury to the current 800 data base system. Since the vendors' delivery dates are not improving and testing cannot be minimized, the April 1996 888 implementation date, as defined in the LEC implementation plan, cannot be moved forward.

8. 888 NXX PLAN: One service provider (AT&T) has suggested that the industry implement the new 888 code in an interim NXX environment. This suggestion presumes that a nationwide, switch-based NXX plan could be deployed more rapidly than a data base service. Using a switch-based NXX plan, LECs could possibly -- though this estimate is far from certain -- meet an implementation date of January 1, 1996, for an 888 NXX service. However, the work involved in

deploying 888 NXX would take resources away from 888 data base, thus delaying the April 1, 1996 implementation of 888 portability.

The Commission would immediately have to establish guidelines for 888 NXX assignment. These guidelines must address how many NXXs each service provider can request and how the specific NXXs will be distributed. The normal industry procedure for establishing number guidelines would take far too long. Also, the NANPA would have to execute the NXX guidelines in emergency mode to insure that interested service providers received their assignments in time. LECs cannot begin network activation until the service providers issue orders, and those orders cannot be issued until the NXXs are assigned. Every 800 service provider would, however, not only request and receive NXXs, but also will submit activations requests to all LECs at the same time. Each LEC is likely to receive requests to activate hundreds of NXXs for dozens of service providers. Since no precedent for this level of concurrent ordering exists, normal activation intervals will not apply.

An 888 NXX plan would eliminate some carriers' ability to participate in offering 888 service. Carriers and customers who use the 800 data base for multiple carrier routing and POTS translations would not be able to use 888 service. This creates a discriminatory environment against those service providers who do not have their own 888 to POTS translation capabilities and against LECs who will depend on such translations to offer their intraLATA 888 service.

The industry would ultimately be involved in a conversion from the NXX plan to a portable environment. Complex transition plans, schedules, and industry-wide testing and implementation would be required. The cost to each industry participant could be significant. Each LEC would have to coordinate with the FCC on cost recovery.

And, of course, an 888 NXX plan would not provide number portability, the *raison d'être* of the current 800 service. The Commission ordered 800 portability to encourage competition, advance existing NXX technology and give customers more choice in the toll free market. Retreating to an 888 NXX plan would stifle competition, limit customer choice, and re-institute an outmoded technology. Subscribers with an 888 NXX, unable to change providers in a multi-carrier environment, would be at a serious disadvantage vis-à-vis 800 data base subscribers.

An NXX plan would create significant confusion in the marketplace. Customers are just now understanding what a portable environment means. Instituting an NXX plan for 888 on an interim basis would negate the work the industry has done to educate customers about portability and would instead create confusion.

An 888 NXX plan could possibly — though this is far from certain and is dependent on resolving the issue stated above — shorten the period that toll free numbers are not available by providing 888 numbers a little sooner. An 888 NXX plan would not, however, prevent exhaust.

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PERSONAL COMMUNICATIONS SERVICES N00 NXX CODE ASSIGNMENT GUIDELINES

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This revision includes the reclamation text developed by the Industry Numbering Committee (INC) in association with Issue #029 - NANP Resource Reclamation.